

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

SHAILA BERNARD,

Plaintiff,

v.

RTX CORPORATION, f/k/a RAYTHEON  
TECHNOLOGIES CORPORATION

Defendant.

Case No. 3:24-cv-02944-X

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendant Raytheon Company, improperly identified in the Complaint as “RTX Corporation, f/k/a Raytheon Technologies Corporation,” moves unopposed for a twenty-eight day extension of time, up to and including January 15, 2025, for Defendant to respond to Plaintiff’s Complaint. In support of its motion, Defendant states:

1. On November 22, 2024, Plaintiff filed the operative Complaint in this action.
2. On November 27, 2024, a copy of the Complaint was served on Defendant.
3. Defendant’s response to the Complaint is currently due December 18, 2024.
4. Defendant needs additional time to investigate Plaintiff’s claims and prepare its response to the Complaint. In addition, defense counsel and several witnesses will be on previously scheduled vacations during December 2024 and early January 2025. Defendant, therefore, seeks a twenty-eight day extension of time, up to and including January 15, 2025, to respond to Plaintiff’s Complaint.

5. On December 4 and 17, 2024, Defendant's counsel contacted Plaintiff's counsel by email regarding the substance of this motion. Plaintiff indicated that he had no objection to the requested extension of time.

6. This is Defendant's first motion for an extension of time, and it is being made prior to the current deadline. The Court has not yet issued a scheduling order, this request is made in good faith and not for the purpose of causing undue delay, and no party will be prejudiced by the extension.

WHEREFORE, for good cause shown, Defendant respectfully requests that the Court enter an order granting Defendant a twenty-eight day extension of time, up to and including January 15, 2025, to respond to Plaintiff's Complaint. A proposed Order is enclosed.

DATED: December 17, 2024

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Esteban Shardonofsky

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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF CONFERENCE**

On December 4 and 17, 2024, Defendant's counsel conferred with Plaintiff's counsel regarding this motion, and Plaintiff's counsel indicated that he had no objection to a twenty-eight day extension of time for Defendant to respond to Plaintiff's Complaint.

/s/ Esteban Shardonofsky  
Esteban Shardonofsky

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing document was served upon the person(s) listed below via the Court's CM/ECF electronic filing system on this 17<sup>th</sup> day of December, 2024:

Donald E. Uloth  
Law Office of Donald E. Uloth  
182028 Preston Road, Suite D-9 #261  
Dallas, Texas 75252

ATTORNEY FOR PLAINTIFF

/s/ Esteban Shardonofsky  
Esteban Shardonofsky